

Going Part 145

Tips for starting a repair station

By Bill O'Brien

So you've decided you want to get certified as a Part 145 repair station? Whether you are an existing maintenance facility wishing to become certified, or are a start-up business, consider the following: For starters, an FAA certificate hanging on a maintenance facility's wall opens many business opportunities. Many corporate operators, Part 121, and Part 135 air carriers have written policy that limits maintenance performed on their aircraft to only FAA Part 145 repair stations. A Part 145 repair station certificate will also allow you to petition the Joint Aviation Authority (JAA) for its certification and a chance to compete in Europe. But the most important reason is that a Part 145 certificate tells the world that you subscribe to a higher standard of accountability and performance.

There are a few negative aspects hanging out there when you apply for, and after you earn the Part 145 certificate; The certification process is tough on first timers. Another unique challenge is in the interpretation of the 56-year-old Part 145 rule. But there's no question that the benefits of being a Part 145 repair station far outweigh the drawbacks.

What follows is a good overview of the FAA certification process that you can include in your business plan.

The Six Steps of the Certification Process

The FAA has developed a generic process for certificating organizations. The process contains six phases or steps, if you include the informal inquiry. They are:

- Informal inquiry
- Preapplication
- Formal application
- Document compliance
- Demonstration and inspection
- Certification

Informal inquiry

This is the initial meeting, held at your place or at the Flight Standards District Office (FSDO). It is supposed to be a relaxed meeting between you and FAA inspectors. However, some applicants have remarked that this meeting is a lot like the first time you met your future in-laws and just as stressful.

During the informal meeting both sides seek to uncover the other's intentions. The applicant wants to find out if the FAA inspectors are fair and reasonable individuals who will actively support the request for certification or if they are tourists, on a vacation, from a tar pit in Hell.

On the FAA side of the table, the inspectors behave a lot like experienced bettors at the race track. They will try to gauge the applicant's experience, knowledge, and determination to see if they should bet the government's time and resources on this person or wait for the next race.

Part of the FAA inspector's process of picking the winners from the starry-eyed applicants begins by asking them tricky, "make-you-think" questions like: What kind of a rating do you want? What kind of data will you use? How are you going to keep the data current? When do you expect to be ready for certification? Etc!

If the applicant answers most of the FAA questions without showing too many "deer caught in the headlights" expressions, and if both parties are now satisfied with the results of this initial touchy-feely kind of informal inquiry, then the next step is a little more formal and is called the "preapplication meeting."

Before this meeting the FAA will probably ask you to provide them with at least three choices for a three-letter identifier that will prefix your certificate number, and they will explain how to fill out a preapplication statement of intent (FAA Form 8400-6) which should detail the kind of maintenance you wish to perform (ratings), the facilities and equipment you will use, and the date when you plan to begin operating.

Before you meet again, the FAA district office manager will do some homework and form a certification team, making one of the inspectors the certification project manager (CPM). The CPM is the individual who is responsible for keeping the certification process on schedule.

Preapplication Meeting

This is a sit-down, formal affair that is usually held at the local FAA district office. Most of the time there are two or more FAA inspectors present. I am told by knowledgeable industry folks that some applicants suspect that the FAA inspectors have been given secret instructions from Washington, not to smile.

The preapplication meeting will include, but is not limited to, the following:

- Introducing the members of the FAA certification team. A review of the preapplication statement of intent (PASI, FAA Form 8400-6) on how to complete the form.
- A review of applicable FARs and advisory circulars.
- A review and discussion of certification procedures.
- A discussion centering on what the applicant must provide.
- A discussion on the proposed organizational structure and facilities.
- Special tools, manuals, data, and test equipment required.
- A discussion on drafting a letter of compliance.

A letter of compliance is a letter listing the applicable FAR that your repair station must comply with. (Start with FAR 145, but do not forget to include applicable rules in Part 21, 39, 43, 65, and 91.) After each rule, write a short summary of each rule. Then under the summary address how you are going to comply with that rule in your repair station.

The main purpose of this meeting is to see if the applicant has done his homework and is mentally and financially prepared to take on the certification process. The preapplication meeting is also a learning session in which all the pertinent FAR and Advisory Circulars are reviewed and instructions on completing the application for a repair station (FAA Form 8310-3) are reviewed. Unfortunately, at least 50 percent of the folks who do summon up enough courage to darken the door of an FAA FSDO for a preapplication meeting either die of fright or trash the idea of becoming a repair station after listening to the preapplication's daunting FAA requirements that must be satisfied.

From our point of view the FAA has done these folks a big favor. The government tested their mettle and found them wanting. (This may seem harsh, but we believe that if an applicant cannot pass the FAA certification process, the chances are very remote that they could have survived a year in today's tough aviation business climate.)

If it becomes obvious to the FAA the applicant is not ready or is not able to satisfy the requirements, the FAA will terminate the certification process. Of the 50 percent who survive the preapplication gauntlet the next step is to submit the initial paperwork.

The Formal Application

This begins when the applicant formally submits the application package. The package is initially reviewed by the FAA usually within five working days and is either accepted or rejected. The FAA is looking at the following items:

1. Completed application (FAA Form 8130-3).

2. Proof that the applicant has use of the facilities.
3. Proof that the applicant has current manuals and Data.
4. Letter of Compliance.
5. Two copies of any contracted functions to be performed.
6. Two copies of the Inspection Procedures Manual (IPM).

Item “6” requires some explanation: The biggest problem that all new applicants face is the development of an acceptable Inspection Procedures Manual (IPM). The IPM should explain in detail: how a part or a product enters the applicant facility; how incoming and hidden damage inspections are performed; as well as describe tear down, assembly, final inspection, training, duties and responsibilities of supervisors and employees, how paperwork is handled, how approval for return to service is signed off; and more.

Sadly, many applicants seek to avoid this wearisome step-by-step description of how they are going to do business by buying a generic manual(s) and cutting and pasting bits and pieces of appropriate sounding phrases and paragraphs together to create their “own” IPM.

Instead of creating a living document that explains how the repair station will comply with the FAR, the applicant has put together a Frankenstein monster.

A more sensible approach to creating the IPM is to take the letter of compliance that you submitted earlier and write your manual in your own words. But always refer back to your letter of compliance to ensure you did not omit any rules. When the IPM is finished, check that you’ve addressed every rule and make a reference under each rule in the letter of compliance to the chapter or page number in the IPM that complies with that rule. Keep a crib sheet of references.

This procedure has a couple of pluses going for it: It will force you to address important compliance issues in a professional manner, and in doing so you will have a better understanding and appreciation of the regulations as you create a world-class IPM. In addition, when you submit your IPM to the FAA and your letter of compliance, make sure that you tell them about the crib sheet that you’ve created. The FAA, like you, has to ensure that you’ve addressed each rule; a handy guide that tells them where each rule is addressed in the IPM is a real time saver. Why, you might even see one of them smile prematurely.

Most of the time there will be a formal application meeting where all members of the FAA certification team will meet with the applicant to hash out any differences, and resolve discrepancies. If agreement cannot be reached in any areas, the FAA certification team may terminate the meeting. The applicant would then have his formal application package returned — followed later by a letter of rejection that will formally explain why the FAA refused the application.

If the FAA certification team accepts the application, the applicant will receive a letter of acceptance shortly after the meeting.

The letter of acceptance might seem a waste of the government’s time and resources when a telephone call or a firm hand shake would suffice. However, this letter signifies a lot more.

When the FAA formally “accepts” your application by letter, it declares that the FAA is willing to commit manpower and resources to complete the applicant’s certification process. The letter of acceptance also marks the “true beginning” of the certification process. The clock is now running and the document compliance phase can begin.

Document Compliance Phase

During this phase, the FAA inspectors put on their green eye shades and read every line in your paperwork and manuals. This is also the phase where we lose another 15 to 20 percent of the applicants that are shot down due to bad manuals and paperwork.

But the IPM is not the only document that’s carefully examined. The team could also examine process specifications, approved data, reference documents, and if applicable, the repairman

application along with its letter of recommendation. All documents in the package must be examined by the FAA. Each one of them must be individually reviewed and either accepted or rejected. If a document or the IPM is rejected, it will be returned to the applicant with a letter explaining why the document was refused.

Documents and IPM are not the only items placed under the jaundiced eye of the FAA. The FSDO will also run the applicant's profile through the agency's Integrated Safety Information Subsystem. If the inspector finds that the applicant has a suspension or revocation order in effect, the certification process comes immediately to a screeching halt.

If the manuals, documents, and humans pass the FAA physical, it's on to the next phase, demonstration and inspection. This is where the repair station concept of compliance with the FARs in the real world will be examined.

Demonstration and Inspection Phase

Sometimes referred to for no apparent reason, as the "hairy armpit" phase, the demonstration and inspection phase is when the FAA certification team inspects the applicant's facilities and check out the equipment. They observe personnel in the performance of their duties and ask them enigmatic questions like "Please tell me what you are doing, how you are doing it, and why?"

Next, the FAA team must determine in this phase that the applicant is in compliance with the IPM, FAR, and performs maintenance in accordance with safe operation practices. It is not as easy as it sounds. So, the size and complexity of the applicant's operation determines the length of time it will take for the FAA to make its determination.

If a deficiency is noted, it's usually corrected on the spot, with a manual revision if applicable. If the demonstration of compliance phase uncovers too many problem areas, then the FAA certification team will end the inspection and discuss with the applicant how to correct the problems and/or reschedule the inspection as necessary.

The FAA team follows up the discussion with a letter describing the discrepancies, the applicant's proposed plan of action, and the date of the next inspection. When the reinspection is satisfactory, the FAA team then ends the demonstration and inspection phase, and the last and easiest part of the certification phase begins.

The Certification Phase

This phase is the easiest for the applicant because all they have to do is to show up at the FSDO at the appointed time, and do just three things:

1. Grin like a brand new parent.
2. Shake the FSDO manager's hand when handed the Part 145 repair station certificate .
3. Make politically correct comments, like "I really learned a lot" and "Gee, it was great working with you."

When the certification process is completed and the brand-new dream-maker has left the FSDO with the repair station certificates in their hot little hands.